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*Attorneys for Plaintiffs Theresa Beiner and
Brandon Haubert in Beiner, et al. v. Facebook,
Inc., et al., No. 3:18-CV-1953*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

LAUREN PRICE, on behalf of herself and
all others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC., and CAMBRIDGE
ANALYTICA, LLC

Defendants.

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CASE NO. 3:18-CV-01732-VC

**DECLARATION OF DAVID RUDOLPH IN
SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
CASES SHOULD BE RELATED**

Hon. Vince Chhabria

1 Under 28 U.S.C. § 1746, I, David Rudolph, declare as follows:

2 1. I am a partner with the law firm of Lieff Cabraser Heimann & Bernstein LLC,
3 counsel for Plaintiff Theresa Beiner and Brandon Haubert who filed a consumer class action
4 complaint on March 29, 2018 in the United States District Court for the Northern District of
5 California, captioned *Beiner, et al. v. Facebook, Inc., et al.*, No. 18-cv-1953 (“Beiner Action”).
6 Pursuant to Civil Local Rule 7-11, I submit this declaration in support of Plaintiffs Theresa
7 Beiner and Brandon Haubert’s Administrative Motion to Consider Whether Cases Should Be
8 Related. If called to testify as a witness, I could and would competently testify to the matters
9 stated herein.

10 2. I was unable to obtain a stipulation signed by all affected parties or their counsel
11 before filing this Administrative Motion. As of this filing, no counsel have appeared for Global
12 Science Research Ltd., which is named as a defendant in the actions captioned *Kooser et al. v.*
13 *Facebook, Inc. et al*, No. 4:18-cv-02009-YGR and *Rubin v. Facebook, Inc., et al.*, No. 3:18-cv-
14 01852.

15 3. I declare under penalty of perjury that the foregoing is true and correct. Executed
16 on April 13, 2018, at San Francisco, California.

17
18 /s/ David Rudolph
David Rudolph